

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

---

21MC103(AKH)

BLANCA SAETEROS (AND HUSBAND, DARIO  
ENCALADA,

08CV2305(AKH)

Plaintiff(s),

-against-

100 CHURCH LLC, et al.,

Defendants.

---

**NOTICE OF ADOPTION BY  
ZAR REALTY  
MANAGEMENT CORP. OF  
ANSWER TO MASTER  
COMPLAINT**

**PLEASE TAKE NOTICE** that defendant **100 ZAR REALTY MANAGEMENT CORP. n/k/a SAPIR REALTY MANAGEMENT CORP.** for the building located at 100 Church Street, (hereinafter “ZAR/SAPIR”), as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above reference action, herein adopts ZAR/SAPIR’s Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). To the extent that ZAR/SAPIR’s Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, ZAR/SAPIR denies truth of specific allegations.

**WHEREFORE**, ZAR/SAPIR demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
May 14, 2008

**HARRIS BEACH PLLC**

*Attorneys for Defendant*

ZAR REALTY MANAGEMENT CORP. n/k/a  
SAPIR REALTY MANAGEMENT CORP.

/s/

---

Stanley Goos, Esq. (SG 7062)  
100 Wall Street, 23<sup>rd</sup> Floor  
New York, New York 10005  
(212) 687-0100

TO:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
***Liaison Counsel for Plaintiff***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102  
***Liaison Counsel for the Defendants***

**All Counsel via ECF**

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on May 14, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Zar/Sapir's Adoption of Answer to Master Complaint.

Dated: May 14, 2008

/s/  
Stanley Goos, Esq. (SG 7062)